REMARKS

Rejection Under 35 U.S.C. 102(e)

Claims 1, 5-10, 11, and 15-20 stand rejected under 35 U.S.C. 102(b) as being unpatentable over U.S. Patent No. 5,748,188, to *Hu, et al.* ("**HU**"). Applicants respectfully traverse the rejections.

As will be explained below, it is believed that the claims were patentable over the cited art in their previously presented form and, therefore, the claims have not been amended to overcome the references.

Before discussing the cited references in detail, it is believed that a brief review of the invention as claimed would be helpful. Claim 1 calls for, *inter alia*, a method for rendering data on a user device, the method including:

> receiving the data at the user device along with one or more concept identifiers identifying a plurality of rendering instructions;
>
> retrieving the rendering instructions based at least in part on one or more the concept identifiers; and
>
> rendering the data on the user device, using the rendering instructions.

Independent claim 11 includes similar language directed to an apparatus for rendering data on a user device.

It is well settled that anticipation under 35 U.S.C. §102 requires the disclosure in a signal piece of prior art to teach **each and every** limitation of a claimed invention. *Electro Med. Sys. S.A. v. Cooper Life Sciences*, 34 F.3d 1048, 1052; 32 USPQ2d 1017, 1019 (Fed. Cir. 1994). Thus, to anticipate the present invention **HU** must disclose every element recited in the pending claims.

However, **HU** fails to anticipate, *inter alia*, at least the required operations of claim 1:

(a) receiving one or more concept identifiers identifying a plurality of rendering instructions;

(b) retrieving the rendering instructions based at least in part on one or more of the

concept identifiers; and

(c) rendering the data on the user device using the rendering instructions.

By way of contrast, the disclosure in **HU** relied upon by the final Office Action (col. 23, lines 46-53) merely teaches of a client 12 generating a graph by:

(a) running a parser against graph elements received from a server,

(b) creating an object,

(c) copying the parsed results into the object, then

(d) executing a viewer which passes the object to a graph server.

Col. 26, lines 36-54 further teaches that the graph server may then convert the graph elements received by the client to a GIF format, which may then be viewed by any browser with bit-map viewing capabilities. The final Office Action attempts to equate "graph attributes" of **HU** with "concept identifiers". The "graph attributes" of **HU** may, or may not, *instruct* a "browser what width and height the graph dimensions should be rendered" as asserted. However, **HU** does not teach or suggest that the graph attributes "**identify**" rendering instructions to be "**retrieved**" as required by claim 1. Even assuming, *arguendo*, that the graph attributes do *instruct* the browser how to render the graph, then **HU** actively teaches away from the necessity of "**identifying**" and then "**retrieving**" those same instructions to then render the data because the graphic attributes would already have (or contain) those instructions.

Therefore, **HU**, at the very least, teaches neither the operations of "receiving ... one or more concept identifiers identifying a plurality of rendering instructions" nor of "retrieving the rendering instructions ...." as required by claim 1.

Accordingly, claim 1 is patentable over **HU** under 102(b).

Claim 11 contains in substance the same limitations as claim 1; and thus, for at least the reasons stated above, claim 1 is patentable over **HU**.

Claims 5-10 and 15-20 depend from either Claim 1 or 11, incorporating its limitations. Therefore, for at least the same reasons, Claims 5-10 and 15-20 are patentable over **HU**.

Rejection Under 35 U.S.C. 103(a)

Claims 2-4 and 12-14 stand rejected under 35 U.S.C. 103(a) as being unpatentable over **HU** in view of RFC 1866 for Hypertext Markup Language – 2.0 by T. Berners-Lee and D.

Connolly, hereinafter referred to as **RFC1866**. Applicants respectfully traverse the rejections.

RFC1866 does not remedy the above-discussed deficiency of **HU**. Therefore, claims 1 and 11 remain patentable over **HU** even when combined with **RFC1866**.

Claims 2-4 and 12-14 depend on either Claims 1 or 11, incorporating its limitations. Therefore, for at least the same reasons, Claims 2-4 and 12-14 are patentable over **HU** and **RFC1866** combined.

CONCLUSION

Claims 1-20 are believed to be in condition for allowance. Entry of the foregoing remarks is respectfully requested and a Notice of Allowance is earnestly solicited.

Please charge any shortages and credit any overages to Deposit Account No. 500393.

Respectfully submitted,
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